

**SK-1642**  
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Attorneys for Jazz Photo Corp.,  
Debtor-in-Possession

**Public Version**

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In the Matter of : UNITED STATES BANKRUPTCY COURT  
JAZZ PHOTO CORP., : FOR THE DISTRICT OF NEW JERSEY  
Debtor-in-Possession. : HONORABLE MORRIS STERN  
: CASE NO. 03-26565 (MS)  
: Chapter 11  
: **AFFIDAVIT OF JEFFREY KAPLAN IN  
OPPOSITION TO MOTION TO APPOINT  
CHAPTER 11 TRUSTEE**

**HEARING DATE:**  
**July 30, 2003, 10:00 a.m.**

STATE OF NEW JERSEY )  
SS.:  
COUNTY OF MIDDLESEX )

JEFFREY KAPLAN, of full age, being duly sworn according to law, upon his oath,  
deposes and says:

1. I am an attorney-at-law of the State of New Jersey and a partner in the firm of Kaplan & Gilman, LLP. I am familiar with the facts contained herein which are true.

2. I have represented the Debtor, Jazz Photo Corp., in proceedings brought by [

].

3. Because of the outbreak of SARS in the Far East, [

] was temporarily discontinued because of counsel's inability to travel to the Far East.

4. It is my understanding that Fuji has argued for the appointment of a Chapter 11 Trustee in the Debtor's case, in part, based upon its allegations that [

]. In the event that Fuji seeks to prove these unfounded allegations in the context of the Motion for a Chapter 11 Trustee, I will not be able to adequately respond and defend the Debtor unless [

].

5. Annexed collectively hereto as Exhibit A are true copies of the [

].

6. The [ ]:

(i) [

];

(ii) [

];

(iii) [ ]; and

(iv) [

].

7. In addition, I will not be able to adequately prepare for the hearing unless I can

[ ].

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/s/ Jeffrey Kaplan

JEFFREY KAPLAN

Sworn and subscribed to before me  
this 24<sup>th</sup> day of July, 2003.

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/s/ Paula M. Halsey

Notary Public of the State of New Jersey  
My Commission Expires 1/13/2005  
I.D. No. 2173683